

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-X

E. JEAN CARROLL,

Civil Action No.:
22-cv-10016

Plaintiff,

– against –

DONALD J. TRUMP,

Defendant.

-X

DECLARATION OF MATTHEW G. DeOREO

I, MATTHEW G. DeOREO, declare as follows under the penalty of perjury:

1. I respectfully submit this Declaration in support of the motion for partial summary judgment of Defendant Donald J. Trump, seeking the dismissal of Plaintiff's defamation claim (Count II of the Complaint filed in this action [*Carroll II*]) in its entirety with prejudice, with such other and further relief as the Court deems just and proper.

2. The sole purpose of this Declaration is to submit Exhibits to the Court. These exhibits are as follows:

- a. **Exhibit A:** A true and accurate copy of Plaintiff's Complaint that she filed in *Carroll I*¹;
- b. **Exhibit B:** A true and accurate copy of Defendant's Answer filed in *Carroll I*;
- c. **Exhibit C:** A true and accurate copy of Plaintiff's Complaint that she filed in *Carroll II*;

¹ *Carroll v. Trump*, 1:20-cv-7311-LAK-JKLC.

- d. **Exhibit D:** A true and accurate copy of Defendant's First Amended Answer filed in *Carroll II*;
- e. **Exhibit E:** A true and accurate copy of the Transcript of the Anderson Cooper interview of Plaintiff on June 24, 2019; and
- f. **Exhibit F:** A true and accurate copy of the following media article: Jordan Fabian & Saagar Enjeti, *EXCLUSIVE: Trump Vehemently Denies E. Jean Carroll Allegation, Says "She's Not My Type"*, Hill (June 24, 2019).

3. I declare under the penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
February 23, 2023



MATTHEW G. DeOREO